

July 2, 1999

Elizabeth Lamping
136 Grand View Avenue
San Francisco, CA 94114

7825 '99 JUL 12 10:28

Dockets Management Branch
The Food and Drug Administration
Department of Health and Human Services, Rm. 1-23
12420 Parklawn Dr.
Rockville, MD 20857

Re: 99P-1340/CP 1
Petition to Have "Eternity eau de parfum" Misbranded

To Whom It May Concern:

I teach elementary school in Redwood City, CA. I have asthma, many allergies and get migraine headaches. One of the things that gives me trouble is perfume, but everyone seems to use it. I have even had second grade children come into my class wearing cologne! I can't teach with a migraine, so I had to write a letter telling parents that I would have to send their children out of the classroom if they were wearing fragrances. Sometimes I don't know which bothers me more at school--the pesticides or the perfumes. We need warning labels on fragrance products, so people know they should be careful about how and where they use them.

In May, 1999, the Environmental Health Network (EHN) submitted the above petition to have Calvin Klein's "Eternity eau de parfum" declared misbranded. I am writing because I fully support this petition and request that the FDA give it careful attention with regard to your regulations **21CFR Sec. 740.1**, **21CFR Sec. 740.2**, and **21CFR Sec. 740.10**. Regulation **21CFR Sec. 740.10** specifically states:

"Each ingredient used in a cosmetic product and each finished cosmetic product shall be adequately substantiated for safety prior to marketing. Any such ingredient or product whose safety is not adequately substantiated prior to marketing is misbranded unless it contains the following conspicuous statement on the principal display panel: "Warning--The safety of this product has not been determined."

As the petition shows, "Eternity" contains toxic ingredients and ingredients whose safety have not been substantiated. There is no warning label on its packaging.

Like tobacco smoke, the harmful chemicals currently used in these products may effect the health of many people, including: people with asthma, chemical sensitivities, chronic fatigue, and other environmental illnesses. Children are particularly vulnerable to toxic chemicals found in products purchased and used

99P-1340

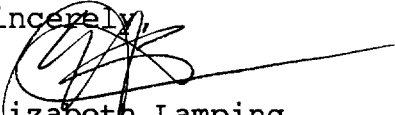
C 159

by their parents, care givers and teachers.

We all have a right to know the status of safety testing of the ingredients in products such as "Eternity" so that we can protect ourselves and our families from toxic chemicals that may cause health problems. Most people are not aware that most fragrance materials have only limited safety testing. They wrongfully assume these products are safe to use in any setting and are surprised when people complain.

Please act on behalf of the millions of people who have suffered physical illness and injury resulting from fragrance exposure at work, at school and in social settings. These toxic chemicals act as powerful barriers to people disabled by asthma and chemical sensitivities. Because of this, toxic chemicals in fragrances have already ruined countless lives. I am especially concerned that they be kept away from children and out of schools, along with pesticides and other harmful chemicals. Thank you.

Sincerely,



Elizabeth Lamping

E. Lamping
136 Grand View Ave
San Francisco, CA
94114



Dockets Management Branch
Food and Drug Admin.
Dept. of Health + Human Services. Rm 1-23
12420 Potklawu Dr.
Rockville, MD 20857

